

# **Exhibit I**

11/7/2019

New Jeffrey Epstein accuser emerges; defamation suit filed | Miami Herald



Palm Beach sex offender's remarkable

Jeffrey Epstein has been a free man, despite sexually abusing dozens of underage girls according to police and prosecutors. His victims have never had a voice, until now.

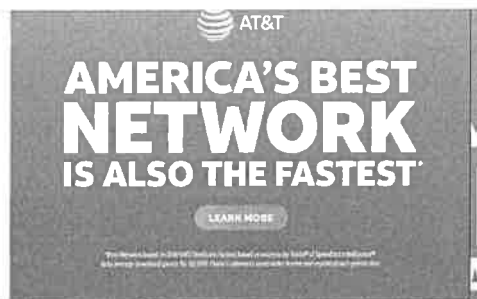
BY JULIE K. BROWN

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Victims of Jeffrey Epstein's sexual abuse voice their



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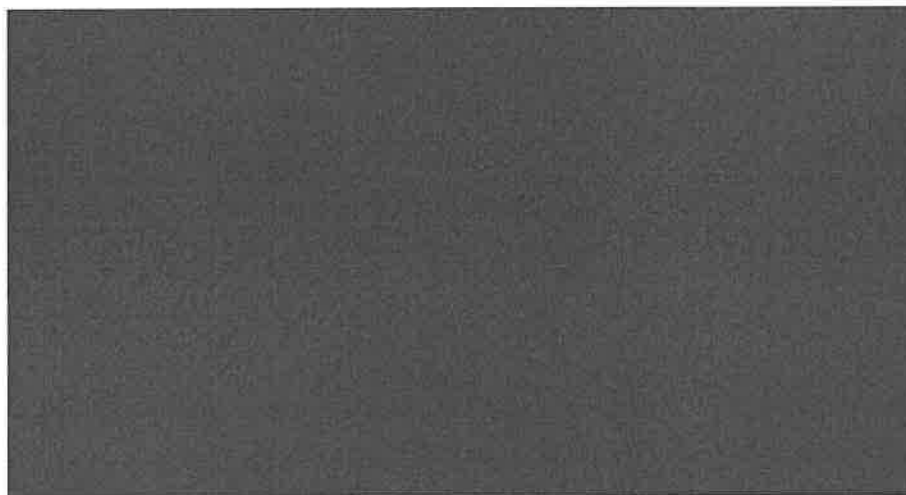
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NATION &amp; WORLD

## New Jeffrey Epstein accuser goes public; defamation lawsuit targets Dershowitz

BY JULIE K. BROWN

APRIL 16, 2019 04:23 PM, UPDATED APRIL 16, 2019 06:18 PM



Palm Beach multimillionaire Jeffrey Epstein has been a free man, despite sexually abusing dozens of underage girls according to police and prosecutors. His victims have never had a voice, until now.

BY EMILY MICHOT | JULIE K. BROWN

A new victim has gone public in the [Jeffrey Epstein case](#), filing a sworn affidavit in federal court in New York Tuesday, saying that she was sexually assaulted and her then-15-year-old sister molested by Epstein and his companion, Ghislaine Maxwell, in 1996.

Maria Farmer, then 26, claims that she was employed by Epstein, a multimillionaire financier who lived in a vast mansion on New York's Upper East Side, and that she frequently saw "school-age

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Maria Farmer

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"To my knowledge, I was the first person to report Maxwell and Epstein to the FBI. It took a significant amount of bravery for me to make that call because I knew how incredibly powerful and influential both Epstein and Maxwell were, particularly in the art community," she wrote.

Farmer's affidavit is one of 15 exhibits attached to a [defamation complaint filed in federal court](#) in the Southern District of New York by Virginia Roberts Giuffre, one of Epstein's victims, against Alan Dershowitz, one of Epstein's most vocal and powerful attorneys.

Giuffre claims in the lawsuit, as she has in past court filings, that Dershowitz, 80, knew about and participated in a sex-trafficking operation involving underage girls and run by Epstein and Maxwell, and that she was forced to have sex with [Dershowitz and other prominent, wealthy men](#) when she was underage.

Dershowitz has railed against the allegations for years, maintaining that he has never met Giuffre. He also says he has documents and other evidence that prove she is lying.

[Complaint by Anonymous QSO42TA:BF](#) on Scribd

Case 1:19-cv-03377 Document 1 Filed 04/16/19 Page 1 of 28

**United States District Court  
Southern District of New York**

VIRGINIA L. GIUFFRE,

Plaintiff,

CASE NO:

vs.

ALAN DERSHOWITZ,

Defendant.

**COMPLAINT**

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1 of 28



Farmer's affidavit and other documents attached to the lawsuit are meant to bolster Giuffre's case that Dershowitz has maliciously spread false information on behalf of Epstein in order to intimidate and silence her and other victims, according to the lawsuit.

"No sensible person looks forward to litigation," Giuffre said in a statement. "And I know that standing up for myself and others will cause Mr. Dershowitz and Mr. Epstein to redouble their efforts to destroy me and my reputation. But I can no longer sit by and not respond. As my complaint shows, my abusers have sought to conceal their guilt behind a curtain of lies. My complaint calls for the accounting to which I, and their other victims, are entitled."

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Ghislaine Maxwell was sued for slander after calling Virginia Roberts Giuffre, one of Jeffrey Epstein's accusers, a liar. Maxwell, a close associate of Epstein, sought to have documents from the court case remain sealed.

Dershowitz said he welcomed the opportunity to finally prove in court that Giuffre is lying.

"Virtually everything in the complaint is false, and I will be able to disprove all of this in a court of law. I have told the truth throughout and I'll be able to prove it. ... I never met her, I never heard of her," Dershowitz said.

In recent months, Dershowitz has waged a public relations war against Giuffre, her lawyers and the Miami Herald, which published a series of articles about Epstein in November. The series, "Perversion of Justice," focused on how the former U.S. attorney in Miami, now Labor Secretary Alexander Acosta, brokered a non-prosecution deal giving Epstein federal immunity, despite overwhelming evidence that he had sexually assaulted dozens of girls. The series mentioned Dershowitz, who represented Epstein during the negotiations, including Giuffre's sex abuse allegations against the Harvard lawyer.

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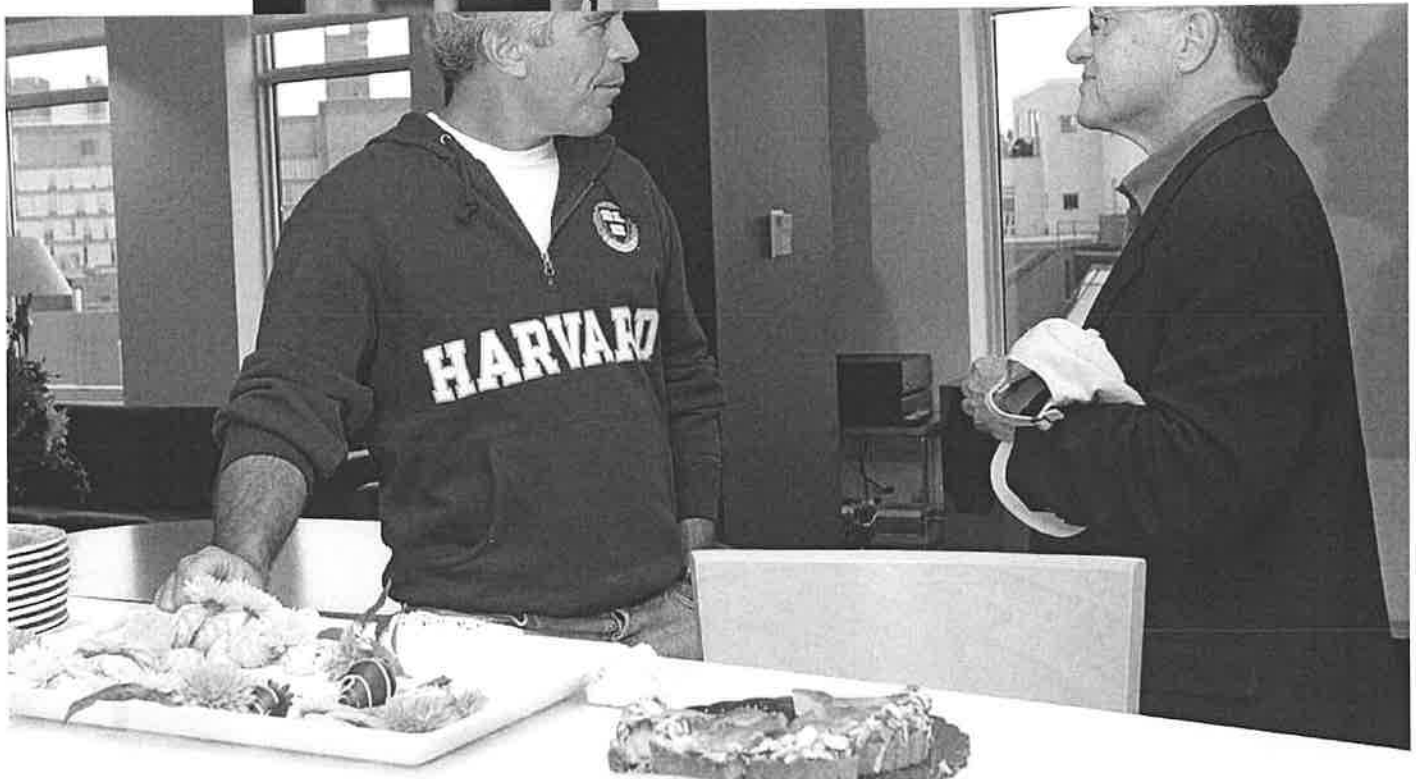
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Once a friend of presidents, the ultra-rich and the elite of Wall Street's bankers — plus a major benefactor to Harvard University — Jeffrey Epstein handled portfolios estimated to be worth over \$15 billion. Then he became ensnared in a scandal involving the sexual abuse of underage girls. He is seen here, pre-scandal, at left, in conversation with Alan Dershowitz, one of America's best-known legal experts and a Harvard Law professor emeritus, at a Cambridge event. Dershowitz became a key member of Epstein's legal team. Rick Friedman CORBIS VIA GETTY IMAGES

Giuffre's lawsuit does not provide evidence of Giuffre having sex with Dershowitz, or provide dates when the abuse allegedly happened. But it does provide a chapter-and-verse history of Dershowitz's public statements and attempts to take each statement he's made and discredit them.

For example, Dershowitz has said that he has never seen any underage girls when he visited Epstein at the financier's various homes in Palm Beach, New Mexico and New York. But Farmer, who now lives in Kentucky, claims that one of her duties working for Epstein was to staff the front door to his New York estate and to keep track of visitors.

"On a number of occasions I witnessed Dershowitz at the NY mansion going upstairs at the same time there were young girls under the age of 18 who were present upstairs in the house," she said in the affidavit, asserting that Dershowitz was so comfortable he would walk into the mansion and go directly upstairs.

Dershowitz said that would have been impossible because he did not meet Epstein until August 1996 on Martha's Vineyard.

"I was never upstairs in Jeffrey Epstein's apartment, never ever," Dershowitz said. "This is typical of the complaints in this case by the [David] Boies firm, very sloppy. I would not have felt



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Another woman, Sarah Ransome, also submitted an affidavit with the lawsuit with new details about sex she claims she had with Dershowitz.

Ransome says that she was introduced to Epstein when she was 22 years old and living in New York. She claims that she spent time at Epstein's mansion and was "lent out" by him to his friends for sex. Among those friends was Dershowitz, she said in the affidavit. She alleges she had a three-way sexual encounter with Dershowitz and Nadia Marcinkova, a young adult who also worked for Epstein.

"I recall specific, key details of his person and the sex acts and can describe them in the event it becomes necessary to do so," Ransome said in the affidavit.

Dershowitz has publicly denounced both Giuffre's and Ransome's accusations, saying he has been able to "disprove" them." It's not clear, however, whom he has provided proof to, except to Louis J. Freeh, a former FBI director who released a statement in 2016 saying that he had conducted an independent review of Dershowitz's information and concluded the Harvard law professor's evidence contradicted Giuffre's, and there was no evidence to support her allegations. Giuffre was never interviewed by the Freeh investigators, according to her lawyers.

Dershowitz allowed the Herald to review some of the documents that he says he has, but he has not released them for the Herald to substantiate the information that he gathered, including his personal calendars, which he claims prove he could not have been in the same locations as Giuffre when she was with Epstein, from 1999 to 2002. Following the online publication of this article, Dershowitz said he would provide those documents to the Herald, after redacting his clients' private information.



The girls who were abused by Jeffrey Epstein and the cops who championed their cause remain angry over what they regard as a gross injustice, while Epstein's employees and those who engineered his non-prosecution agreement have prospered. by MARTA OLIVER CRAVIOTTO | EMILY MICHOT | JULIE K. BROWN

In recent months, Dershowitz has stepped up allegations that Giuffre's accusations against him are part of an extortion plot to blackmail an Ohio billionaire. The billionaire is identified in the lawsuit as Les Wexner, the CEO of the Limited Brands, which includes Victoria's Secret, who was Epstein's top financial client.

Dershowitz alleges that Giuffre and David Boies, a prominent New York attorney known for representing Al Gore in the Supreme Court case that decided the presidency in 2000, falsely

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Boies partners Joshua Schiller and Sigrid McCawley filed the lawsuit on behalf of Giuffre, who lives in Australia.

Efforts to reach Epstein, Wexner and Maxwell for comment were not immediately successful.

Wexner also figures into Farmer's story. In her affidavit, Farmer claims that during the time she was employed by Epstein, the financier arranged for her to work on an art project at Wexner's Ohio mansion in the summer of 1996. She stayed at Wexner's \$47 million 30-room estate for a time, working on the project, while babysitting her two younger brothers, who were also staying with her at Wexner's mansion, she said.

One day, Epstein and Maxwell visited and escorted her into a bedroom and then proceeded to sexually assault her, she wrote. She said she fled the room and called the local sheriff's office, but did not get a response. When she tried to leave the property, she said Wexner's security staff refused to let her go.



Virginia Roberts was working at Mar-a-Lago when she was recruited to be a masseuse to Palm Beach hedge fund manager Jeffrey Epstein. She was lured into a life of depravity and sexual abuse.

BY EMILY MICHOT | JULIE K. BROWN

"I was held against my will for 12 hours until I was ultimately allowed to leave with my father," she said in the affidavit.

During this same time period, she said Epstein took her and her younger sister, then 15, to a movie in New York, where he allegedly rubbed her younger sister in a sexual manner. He then flew the 15-year-old to his ranch in New Mexico, promising her mother that he would help with her education, Farmer said.

Instead, Epstein and Maxwell directed her sister to take off all her clothes and get on a massage table, where they touched her inappropriately, Farmer said. Epstein subsequently flew the sister to Thailand to study, and Farmer did not learn until later what happened to her at the ranch.

Afterward, she said Epstein and Maxwell called her multiple times, threatening her. "Maxwell and Epstein contacted my art clients and individuals in the art community in an effort to ruin my art career," she said, adding that they were successful in shutting down any art-related opportunities.

Journalist Vicky Ward interviewed Farmer, her sister and their mother in 2002 for *Vanity Fair*, but the interviews were stricken from the piece before publication. In a 2015 piece Ward wrote for the



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against me and my hope is that they will be held accountable for their crimes. While I am still afraid, I am coming forward because I think it is so important to do so," she said.

The affidavit does not say what her sister was studying in Thailand, but Giuffre was also flown by Epstein to Thailand in 2002 to study massage therapy. It was then that Giuffre met her future husband and fled with him to Australia.



Sen. Ben Sasse questioned attorney general nominee William Barr about the Jeffrey Epstein case on January 15, 2019, getting the nominee to commit to having the Department of Justice look into the handling of that case if confirmed. BY C-SPAN

The lawsuit says that Giuffre first told others about sex with Dershowitz at the time it allegedly happened, and in 2009, although the suit doesn't identify the individuals she told. In 2011, Giuffre was represented by lawyers Bradley Edwards and Paul Cassell, who wrote Dershowitz to inform him that witnesses had placed him at various locations with Epstein while Epstein was with minors who were subsequently identified as victims of sexual assault, the suit says.

The lawyers were concerned in part because Dershowitz had been a prominent lawyer for Epstein who had assailed some of Epstein's victims in 2006 in an attempt to impugn their credibility. Also, they found it curious that Epstein's deal included a blanket immunity for co-conspirators of his operation who were not named.

The lawsuit claims that Dershowitz masterminded the deal in order to give himself immunity, an allegation that Dershowitz expressly denies.

Giuffre's sexual allegations against Dershowitz became public in 2014 as part of a court filing by Edwards and Cassell. Dershowitz publicly called for the disbarment of the two lawyers, leading them to file a defamation suit against Dershowitz which was subsequently settled, with Dershowitz paying the two lawyers a substantial amount of money, the suit says. Dershowitz falsely claimed that he was exonerated, when in fact, the settlement was reached in Edwards' and Cassell's favor, according to the new lawsuit.

Additionally, Dershowitz tried and failed to get Giuffre to issue a statement that she had been mistaken, the lawsuit asserts.

In December 2015, Dershowitz wrote an email to Boies, who began representing Giuffre in 2015. A copy of the email, attached to the lawsuit, shows that Dershowitz suggested that Giuffre submit a statement saying that she had possibly erred when she identified Dershowitz.

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The recordings are difficult to decipher, with static that seems to blur the context of some of the conversations. But a transcript supplied by Dershowitz appears to show Boies conceding that Giuffre was mistaken in identifying Dershowitz. Boies says Dershowitz taped him without his permission and that he took his comments out of context.

"He conflated the conversations, and they are not in the order that they happened," Boies said, stating that he was merely assuring Dershowitz that, if they found evidence that Giuffre's recollections were mistaken, they would have come to an agreement to issue the statement he wanted.

Ultimately, Boies said, they found her to be truthful, and she passed a lie detector test.

"Dershowitz ... played and described excerpts from those tapes out of context to reporters to try to make it appear that Ms. Roberts' lawyer's hypothetical comments, and characterizations of Dershowitz's assertions, represented that lawyer's conclusions," the suit says.

To further rebut Dershowitz's recordings, a sworn affidavit is included from another attorney who said that he was present when Dershowitz misconstrued what Boies was saying. One of the suggestions that Dershowitz proffered was that Giuffre had confused the Harvard professor with another academic — Dershowitz names him — claiming that the professor looked like him. Giuffre, however, was shown a photo of that other professor and was adamant that she had not confused him with Dershowitz, the lawsuit says.

"Mr. Dershowitz expressed to me that he believed he was making progress in convincing Mr. Boies that [Giuffre] was mistaken in identifying Mr. Dershowitz with someone with whom she had sex. I told Mr. Dershowitz that I thought he was overly optimistic and reading things into what Mr. Boies was saying and hearing what he wanted to hear," wrote the lawyer, David S. Stone, a senior managing partner of Boies' firm who previously worked with Dershowitz on the Claus von Bulow attempted murder case, involving a socialite accused of giving his wife an overdose of insulin.

The suit also said Sarah Ransome had accused Epstein and Maxwell of trafficking her for sex to Dershowitz and others, and that Dershowitz also tried to discredit Ransome similarly to how he had Giuffre.

"After Dershowitz's claimed proof of evidence collapsed, and the evidence of his guilt grew, Roberts' lawyers told Dershowitz in writing that they 'had discovered evidence inconsistent with some of [your] representations,' noting that some of his travel records were incomplete, and therefore were not adequate to show he could not have been in the same place as Giuffre during the time she was working for Epstein, the lawsuit said.

Giuffre claims that Dershowitz is still working on behalf of Epstein, who is using Dershowitz to intimidate victims to deter them from coming forward, fearing a new federal investigation, the suit says.

In February, a federal judge ruled that the non-prosecution agreement Epstein received was illegally brokered by Acosta and other prosecutors in violation of the Crime Victims' Rights Act. As a result, the deal is being reviewed by the Justice Department, which has also opened a probe into Acosta's handling of the Epstein case.

Under a broader deal, Epstein pleaded guilty to two prostitution charges in state court and was sentenced to 18 months in the county jail. He served 13 months, but spent most of his sentence in work release, which allowed him to leave the Palm Beach jail for up to 12 hours a day, six days a week, to go to his office in West Palm Beach.